BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF HAWAII

In the Matter of PUBLIC UTILITIES COMMISSION Instituting a Proceeding to Investigate the Implementation Of Feed–in Tariffs.	DOCKET NO. 2008-0273

BLUE PLANET FOUNDATION'S INFORMATION REQUESTS TO *HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC LIGHT* COMPANY, INC., AND MAUI ELECTRIC COMPANY, LIMITED ON PROPOSED RELIABILITY STANDARDS AND QUEUING AND INTERCONNECTION PROCEDURES

AND

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Blue Planet Foundation ("Blue Planet"), by and through its attorneys Schlack Ito Lockwood Piper & Elkind, and pursuant to the Commission's October 29, 2009 Order Setting Schedule, hereby submits its Information Requests concerning submissions by the Hawaiian Electric Company, Inc., Maui Electric Company, Limited, Hawaii Electric Light Company, Inc. (collectively, "HECO Companies").[1]

[1] On February 3, 2010, the HECO Companies proposed February 16, 2010, rather than February 11, 2010, as the due date for submission of information requests on reliability standards and queuing and interconnection in this proceeding. Letter from D. Endo-Omoto (HECO) to Commission dated Feb. 3, 2010 at 2. The letter proposes that any time extension granted by the Commission be applicable to all parties in the FIT docket. *Id.*at 1. Insofar as the Commission may treat the HECO Companies' letter as a motion for an extension of time under sections 6-61-23 and 6-61-41, Hawaii Administrative Rules, Blue Planet hereby respectfully and formally joins the HECO Companies' motion to extend the time for submission of information requests on reliability standards and queuing and interconnection procedures by Blue Planet and all parties to February 16, 2010.

INFORMATION REQUESTS ON RELIABILTY STANDARDS

BP-HECO-IR-10[2]
Ref.: HECO RS Report[3]

The HECO RS Report states that "Due primarily to the high level of existing and planned renewable resource penetration on the MECO and HELCO systems, the studies indicate that there is minimal to no room at this time to accommodate additional renewable resources (FIT or otherwise) without significant curtailment of either existing or planned renewable resources, or a threat to system reliability." *Id.*, Exhibit 1 at 4 (emphasis added).

a. Assuming there is "minimal room" to accommodate additional renewable resources (FIT or otherwise), please identify the quantity of additional renewable resources (FIT or otherwise) which the MECO[4] and HELCO grids can accommodate at this time.

b. Please explain the relative proportion, stated as a percentage ranging from 0% to 100%, the above conclusion concerning "minimal to no room" is based on curtailment versus reliability concerns.

BP-HECO-IR-11
Ref.: HECO RS Report

The HECO RS Report states that "The impact of this determination is that the integration of FIT resources on the HELCO and MECO systems may have to be temporarily deferred until additional studies can be performed and/or infrastructure developed, so that additional distributed renewable generation can be integrated on these systems without

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[2] The Information Request numbering sequences in this document are continued from Blue Planet's Information Requests filed March 4, 2009 and Informal Information Requests dated December 4, 2009 in this proceeding, to the extent applicable.

[3] *See (i) HECO Companies' Report on Reliability Standards filed Feb. 8, 2010, including Exhibit 1, "Proposed FIT Reliability Standards for the Hawaiian Electric Companies" and attachments, (ii) HECO Companies' Clarification to Reliability Standards Report filed Feb. 9, 2010 (collectively, "HECO RS Report").*

[4] References to "MECO" as used in this document refer to the Maui, Molokai and Lanai grids unless otherwise indicated.

threatening system reliability or causing significant curtailment of other renewable generation." *Id.*, Exhibit 1 at 4 (emphasis added).

a. Please provide a list for HELCO and a list for MECO identifying and describing (i) the specific "additional studies" to be performed, (ii) the estimated time and cost for any such studies, and (iii) whether and to what extent the substance or results of the "additional studies" may be found in completed and currently existing studies.

b. Please provide a list for HELCO and a list for MECO identifying and describing (i) the specific additional "infrastructure" to be developed for HELCO and MECO, (ii) the specific projects and technologies, (iii) the estimated time and cost for any such projects, and (iv) to the extent it is not self-evident, a brief explanation of how the "infrastructure" is expected to enable or support additional distributed generation and transmission-interconnected renewable energy.

BP-HECO-IR-12
Ref.: HECO RS Report

The HECO RS Report states that the HECO Companies support convening a "Reliability Standards Working Group." *Id.*, Exhibit 1 at 4.

a. Please discuss and explain the HECO Companies' proposals with regard to (i) whether the Public Utilities Commission ("Commission") or some other entity would convene and select the membership of the "Reliability Standards Working Group," (ii) whether the "Reliability Standards Working Group" would report to the Commission, (iii) whether and to what extent the "Reliability Standards Working Group" would operate outside of any docket or formal proceeding before the Commission, (iv) avenues for public participation in the "Reliability Standards Working Group," (v) the approximate date (month and year) the "Reliability Standards Working Group" would commence, (vi) whether and to what extent the

"Reliability Standards Working Group" would issue formal and publicly-available reports and the estimated dates (month and year) of availability of any such reports, and (vii) estimated time (year) of disbandment of the "Reliability Standards Working Group" based upon completion of its essential tasks and objectives.

b. Please discuss and explain the HECO Companies' proposals with regard to potential interactions, regarding subject matter and participants, between any "Reliability Standards Working Group" and (i) the Hawaii Clean Energy Initiative working groups, (ii) the feed-in tariff docket (Docket No. 2008-0273), (ii) the integrated resources planning docket (Docket No. 2009-0108), (iii) the PV Host docket (Docket No. 2009-0098), and (iv) the Rule 14H docket (Docket No. 2010-0015).

BP-HECO-IR-13
Ref.: HECO RS Report

The HECO RS Report characterizes the HELCO system as having "high penetrations of distributed generation relative to overall system size." *Id.*, Exhibit 1 at 6. Rule 14H currently requires an interconnection study for distribution level circuits upon reaching 10% of distributed generation capacity, the HECO Companies have proposed raising this threshold from 10% to 15%, and the HECO RS Report indicates that existing variable and non-variable generation totals 4.7% and existing and planned variable and non-variable distributed generation total 8.8% of the HELCO system peak demand, which is below the 10% Rule 14H threshold. In light of these factors, please discuss and explain the HECO Companies' basis and rationale for the characterization of the HELCO system as having "high penetrations" of distributed generation.

BP-HECO-IR-14
Ref.: HECO RS Report

The HECO RS Report states, "As penetration levels of renewable resources continue to increase . . . the conventional methodology for system balancing and frequency control through AGC employed on the Maui, Oahu and Hawaii island systems may no longer be feasible." *Id.*, Exhibit 1 at 10. For each of the Maui, Oahu, and Hawaii island systems, please (i) identify the quantity of renewable energy at which "the conventional methodology for system balancing and frequency control through AGC" may no longer be feasible, and (ii) explain the technical bases and reasons for the foregoing conclusion(s).

BP-HECO-IR-15
Ref.: HECO RS Report

The HECO RS Report refers to observations of HELCO Operations personnel that load-shedding is occurring for losses of generation that previously did not result in under frequency load-shed. *Id.*, Exhibit 1 at 16.

a. Please identify all occurrences of under frequency load shedding ("UFLS") on the HELCO system from January 1, 2008 through the present, including (i) the date of the disturbance (i.e., loss of generation unit), (ii) the system frequency level prior to the disturbance, (iii) the frequency nadir (i.e., lowest frequency excursion), (iv) the frequency level(s) at which the UFLS occurred, (v) quantity of load shed in MWs, (vi) duration of the load shed, and (vii) a brief description of the precipitating generation system disturbance event.

b. Please discuss and explain the effect, if any, of HELCO system UFLS on reliability-related records or statistics concerning System Average Interruption Frequency Index ("SAIFI") and/or System Average Interruption Duration Index ("SAIDI") for the HELCO system.

c. Please provide the various UFLS frequency trip points and associated MWs of target load shed for each UFLS block for the HECO, HELCO and MECO systems.

d. Please discuss and explain whether and to what extent changes in frequency trip settings for distributed generation projects on the HELCO system may impact UFLS.

e. Please provide tables for HECO and MECO equivalent to table titled "HELCO System Frequency Targets and Action Levels" on page 3 of Attachment 3 to the HECO RS Report.

BP-HECO-IR-16
Ref.: HECO RS Report

Please discuss and explain whether and to what extent a requirement that all new distributed generation projects on the HELCO system have expanded under-frequency and under-voltage ride-through capabilities, consistent with the HECO Companies' proposed modifications to Tariff Rule 14H,[5] would prevent or reduce increases in the quantity of UFLS "nuisance trips," and amount of load associated with each such "nuisance trip," assuming additional distributed generation is connected to the HELCO system and all other system design and operation practices remain unchanged.

BP-HECO-IR-17
Ref.: HECO RS Report

The HECO RS Report indicates that the amount of currently installed DG for HECO includes 30 MWs of dispatchable distributed generation (peakers) which would not factor into the consideration for additional DG. Please discuss and explain whether there are any

[5] HECO Transmittal No. 10-01, Attachments 1 and 2, Verification, and Certificate of Service, filed on January 7, 2010; HELCO Transmittal No. 10-01H, Attachments 1 and 2, Verification, and Certificate of Service, filed on January 7, 2010; and MECO Transmittal No. 10-01M, Attachments 1 and 2, Verification, and Certificate of Service, filed on January 8, 2010.

equivalent types of dispatchable distributed generation concerning the HELCO and MECO systems.

BP-HECO-IR-18
Ref.: HECO RS Report

The HECO RS report refers to curtailment of excess energy. *See, e.g., id.*, Exhibit 1 at 19. Please provide, for HECO, HELCO and MECO grids, the actual and/or estimated total amount of curtailed energy, in aggregate and expressed in megawatt hours ("MWh"), by month and by on-peak (day) and off-peak (night) periods, for the period of January 1, 2008 to the present.

BP-HECO-IR-19
Ref.: HECO RS Report

The HECO RS report refers to "planned" distributed generation projects for the HELCO and MECO systems. *Id.*, Exhibit 1 at 15, 25.

a. Please discuss and explain (i) whether and to what extent the HECO RS Report is based on the assumption that any such "planned" distributed generation projects will be in commercial operation during the time period of 2010 to 2012, and (ii) the effect on the discussion and analysis in the HECO RS Report concerning reliability standards if any or all such projects are not in commercial operation during the time period of 2010 through 2012.

b. Please discuss and explain, for the HECO, HELCO and MECO systems, the specific criteria (e.g., executed or Commission-approved power purchase agreement, request for interconnection, etc.) used by the HECO Companies to determine whether a project is a "planned" distribution or transmission generation project as that term is used in the HECO RS Report.

c. Please discuss and explain the rationale and basis for including projects referred to as "Proposed PPA" in Table 4 of Exhibit 1, concerning MECO reliability standards, insofar as the HECO RS Report states that "MECO . . . plans to defer entering into bi-lateral PPA negotiations with the projects shown [in Table 4] as 'Proposed PPA.[.]'" *Id.*, Exhibit 1 at 25.

d. Please discuss and explain whether and to what extent the HECO RS Report assumed the "Wind 2" and "Wind 3" projects on Maui, identified in the HECO RS Report, (i) will or will not incorporate on-site storage technologies for the purpose of mitigating wind generation output variability, and (ii) the extent to which incorporation of on-site storage technologies will or will not affect the reliability standards proposed in the HECO RS Report.

BP-HECO-IR-20
Ref.: HECO RS Report

Table 8 of Exhibit 1 to the HECO RS Report states that it identifies and discusses current "system operating criteria" and various "operating action[s] or rule[s]" for the HECO, HELCO and MECO systems. Please produce electronic and/or hard copies of all formal written operating procedures and/or practices concerning such system operating criteria and operating actions and rules. If any document(s) are not produced, please provide a detailed explanation concerning the basis for not producing such document(s).

BP-HECO-IR-21
Ref.: HECO RS Report

Please discuss and explain whether and to what extent the reliability standards contained in the HECO RS Report may limit or otherwise affect FIT Tier 3 projects.

BP-HECO-IR-22
Ref.: HECO RS Report

Please discuss and explain whether and to what extent the HECO Companies anticipate modifying their ancillary services practices, as described in Attachment 3 to Exhibit 1 of the HECO RS Report, in a manner that is likely to increase the accommodation of intermittent renewable resources, if the Commission adopts the HECO Companies' proposal in the decoupling docket (Docket No. 2008-0274) concerning the Energy Cost Adjustment Clause ("ECAC") heat rate incentive mechanism.

BP-HECO-IR-23
Ref.: HECO RS Report

The HECO RS Report states, "The HELCO system has individual circuits with up to 62% penetration of distributed generation." *Id.*, Exhibit 1 at 15. Please discuss and explain in detail, on an individual circuit basis, any and all technical modifications to HECO, HELCO and/or MECO system circuits with similarly high penetrations of distributed generation.

BP-HECO-IR-24
Ref.: HECO RS Report

Please discuss whether and to what extent studies concerning "excess energy," as that term is used in the HECO RS Report, on the HELCO and MECO systems rely upon data that includes only renewable energy from (i) the addition of FIT Tiers 1 and 2 projects equal to 5% of HELCO and MECO 2008 system peak load, (ii) all existing and planned transmission, and sub-transmission renewable energy projects, or (iii) all existing and planned transmission sub-transmission, and distribution renewable energy projects.

BP-HECO-IR-25
Ref.: HECO RS Report

With regard to curtailment for excess energy:

a. Please provide in electronic format the underlying data for system load duration curves for the HECO, HELCO, and MECO systems for 2008 and 2009, including hourly system load data with the date and time for each hourly load. If any document(s) are not produced, please provide a detailed explanation concerning the basis for not producing such document(s).

b. For all variable renewable energy generation resources subject to curtailment by the HECO Companies due to excess energy, please provide in electronic format the hourly aggregate generation output for the time period of January 1, 2008 through December 31, 2009. If any document(s) are not produced, please provide a detailed explanation concerning the basis for not producing such document(s).

BP-HECO-IR-26
Ref.: HECO RS Report

The HECO RS Report refers to "regulating reserves" for HELCO and MECO. *See, e.g., id.*, Attachment 3 to Exhibit 1 at 8; Attachment 4 to Exhibit 1 at 9. Please discuss and explain whether and to what extent any differences between HELCO and MECO in terms of operating practices account for differences between HELCO and MECO in terms of regulating reserves. Please also briefly describe HECO's anticipated operating practice concerning regulating reserves for the anticipated Kahuku Wind Power project.

BP-HECO-IR-27
Ref.: HECO RS Report

Please discuss and explain whether and to what extent the reliability standards contained in the HECO RS Report comply with the statement in the Feed-in Tariff D&O[6] that "FIT generation should . . . displace fossil fuel generation." Feed-in Tariff D&O at 51.

BP-HECO-IR-28
Ref.: HECO RS Report

The HECO RS Report states that "steady-state excess energy (curtailment) impacts and dynamic system frequency issues are proposed as initial measures" for the reliability standards discussed in the report. *Id.*, Exhibit 1 at 9. Please describe the specific measures utilized to evaluate and analyze alleged excess energy and dynamic system frequency, including specific targets, study methodologies, modeling analyses, technology assumptions, use of a system dispatch models, etc. Please also provide copies of all analyses and model results concerning the foregoing.

BP-HECO-IR-29
Ref.: HECO RS Report

Please provide a list describing all existing and planned energy storage technologies or resources, including but not limited to battery systems, including the island grid location, charging and discharging rate, and MW and MWh capacity of such storage systems. Please also provide a list of all distributed generation resources added in 2008 and added in 2009, expressed in aggregate total MW and differentiated by technology (i.e., solar PV, wind, geothermal, etc.).

[6] Decision and Order filed Sept. 25, 2009 (Docket No. 2008-0273).

BP-HECO-IR-30
Ref.: HECO RS Report

Please (i) provide a list identifying the title and subject matter, author(s), and date of all formal reports, studies, proposals and similar documents identified in the HECO RS Report and in the possession or control of the HECO Companies, and (ii) produce electronic and/or hard copies of all such reports, studies, proposals and similar documents. If any document(s) are not produced, please provide a detailed explanation concerning the basis for not producing such document(s).

INFORMATION REQUESTS ON QUEUING AND INTERCONNECTION PROCEDURES

BP-HECO-IR-31
Ref.: HECO Q&I Report[7]

The HECO Q&I Report (i) states that "it is anticipated that the IO [Independent Observer] will be providing an independent report to the Commission regarding his findings, determinations and recommendations for further action with regard to the program's queuing and interconnection procedures after review of the information requests, responses thereto and comments to be received on February 11, 18 and 22, respectively[,]" and (ii) contains a section titled, "Overview of the Proposed Queuing Process for Tiers 1 and 2." *See id.* at 4; Attachment A at 6-10. Please discuss and explain at what point in time in this proceeding the HECO Companies intend to submit formal and final queuing procedures, including the application form and other relevant documents, for review by all parties and approval by the Commission.

[7] *See* HECO Companies' Report on Queuing and Interconnection Procedures filed Feb. 1, 2010 ("HECO Q&I Report").

BP-HECO-IR-32
Ref.: HECO Q&I Report

The HECO Q&I Report states, "For all completed Application Packages, Hawaiian Electric will assess each project relative to its potential impact on system reliability[.] . . . The IO [Independent Observer] will review the determinations made by HECO before the Applicant is notified of the results." *Id.*, Attachment A at 9.

a. Please discuss and explain whether and to what extent the foregoing assessment is or is not necessary or appropriate, assuming the Commission adopts formal reliability standards in this proceeding, such as the reliability standards proposed by the HECO Companies in the HECO RS Report, that seek to establish a limit on the amount of additional renewable energy that can be incorporated into island grid systems.

b. Please discuss and explain any and all bases, including technical expertise and/or documents and information, upon which the HECO Companies expect the IO to base its review and evaluation of the above-referenced determination by the HECO Companies.

BP-HECO-IR-33
Ref.: HECO Q&I Report

The HECO Q&I Report states (i) that the HECO Companies will consult with the IO to "assess if any changes or revisions to the [queuing] procedures are appropriate[,]" and (ii) that "In consultation with the IO, Hawaiian Electric will reserve the right to impose additional rules or procedures as necessary to ensure that the FIT program is proceeding in accordance with the Commission's orders." *Id.*, Attachment A at 12; Attachment A at 11. Please discuss and explain whether and to what extent the HECO Companies intend to seek formal Commission approval, in the FIT docket or in any other proceeding, of any such changes, revisions, and/or additional rules or procedures regarding the queuing procedures.

BP-HECO-IR-34
Ref.: HECO Q&I Report

The HECO Q&I Report states, "The Applicant is required to pay the estimated cost of the study [Interconnection Requirements Study ("IRS")] prior to initiation of the study." *Id.*, Attachment A at 9. Please discuss and explain the basis and rationale for requiring full IRS payment prior to initiation of the IRS, including whether and to what extent this requirement does or does not constitute a potential impediment to the FIT, as opposed to payment by initial deposit and installments.

BP-HECO-IR-35
Ref.: HECO Q&I Report

The HECO Q&I Report state that "Applicants will already have been required to acknowledge acceptance of the Schedule FIT Agreement as a part of the application submittal process. Projects in the queue which do not require an IRS will have ten (10) business days from the date of notification that they are in the queue to execute the Schedule FIT Agreement." *Id.*, Attachment A at 11 (emphasis added). Please discuss and explain the HECO Companies' position regarding the difference and legal significance, if any, between acknowledging acceptance of the Schedule FIT Agreement as part of the application submittal process and executing the Schedule FIT Agreement.

DATED: Honolulu, Hawaii, February 16, 2010.

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STATE OF HAWAII

In the Matter of PUBLIC UTILITIES COMMISSION Instituting a Proceeding to Investigate the Implementation Of Feed–in Tariffs.	DOCKET NO. 2008-0273

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I HEREBY CERTIFY that on this date a copy of the foregoing document was duly served upon the following individuals by placing a copy of same in the United States Mail, postage prepaid, and/or by electronic service, as follows:

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